Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

MARK T. EDDINGSTON, JEFFERY M. DAVIS, ELRIDGE NICHOLAS BOLLICH, GEORGE GALANIS and RAY A. COX,	§	
Plaintiffs,	§	Civil Action No. 2:12-CV-00422
V.	§	
UBS FINANCIAL SERVICES, INC.	§	
Defendant.	§	

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT UBS FINANCIAL SERVICES, INC.

Defendant UBS Financial Services, Inc. is hereby requested to produce all documents described below in accordance with the Federal Rules of Civil Procedure.

A. DEFINITIONS

1. "Defendant" means Defendant UBS Financial Services, Inc., or any of its officers, directors, employees, agents or representatives.

2. "Person" means and includes any individual, governmental entity or agency, firm, joint venture, sole proprietorship, partnership, corporation, and all other forms of legal entity.

3. "Communication" means any written or oral communication, including but not limited to any correspondence, memorandum, report, record of a telephone call, e-mail, and record or minutes of any meeting.

4. "And" means "and/or." "Or" means "and/or." The plural of any word includes the singular and the singular includes the plural. The masculine gender of any word includes the feminine and the neuter. The past tense of a verb includes the present tense and the present tense includes the past tense.

5. "Documents" means any written or other tangible record or digital record and includes all originals and nonidentical copies of any papers, books, accounts, writings, drawings, graphs, charts, photographs, recordings, audiotape, videotape, computer record, e-mail, other

form of digital or communication media or other data compilations from which information can be obtained and translated into reasonably usable form, and tangible things.

6. "Relating to" means constituting, evidencing, based on, concerning, including or otherwise pertaining to the specified matters in question.

7. "Meeting" means any coincidence or presence of two or more persons, whether or not such coincidence or presence was by chance or prearranged, formal or informal or in connection with some activity other than the matter in question.

B. INSTRUCTIONS

1. All documents described below which are in Defendant's possession, custody, or control shall be produced. Any described document which is not in Defendant's immediate physical possession, but in regard to which the Defendant have a right to compel production from a third person or which is otherwise subject to the Defendant's control, shall be obtained and produced.

2. The production of documents from files and other separate sources shall be performed in such a manner as to insure that the file or source from which a document is obtained may be identified.

3. Documents attached to other documents or materials shall not be separated unless sufficient records are kept to permit reconstruction of the grouping.

4. If Defendant withholds any document from production on the basis of privilege or some other limitation of discovery, Defendant shall nevertheless produce each such document at the deposition and be prepared to identify such document by date, author, addressee and general subject matter and to identify all persons who received any copy thereof or otherwise obtained access thereto.

5. If any document described below was, but is no longer, in the possession of Defendant, or in existence, Defendant shall state whether it is (a) missing or lost, (b) destroyed, (c) transmitted or transferred, voluntarily or involuntarily, to others, identifying such others, or (d) otherwise disposed of, and, in each instance, explain the circumstances surrounding, and authorization for, such disposition and state the date or approximate date thereof. If any of the above information is not available, Defendant shall state any other available means of identifying such document.

C. REQUESTS

REQUEST FOR PRODUCTION NO. 1: All documents evidencing the number of financial advisors of Defendant who were separated from employment with Defendant between December 31, 2005 and December 31, 2011 and subsequently suffered a forfeiture of any firm contributions, market interest or turbo interest accrued for such individual's benefit under Defendant's PartnerPlus Plan for Financial Advisors.

REQUEST FOR PRODUCTION NO. 2: All documents evidencing the amounts of any forfeitures referred to in Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 3: All documents relating to procedures used by Defendant to address the disposition of accruals for the benefit of individuals referred to in Request for Production No. 1 of firm contributions, market interest and turbo interest under its PartnerPlus Plan for Financial Advisors during the period referred to in the Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 4: All documents relating to procedures used by Defendant to determine whether to forfeit firm contributions, market interest and turbo interest under its PartnerPlus Plan for Financial Advisors accrued for individuals referred to in Request for Production No.1 under its PartnerPlus Plan for Financial Advisors during the period referred to in Request for Production No.1.

REQUEST FOR PRODUCTION NO. 5: All documents relating to any contention by Defendant that the PartnerPlus Plan for Financial Advisors is not subject to the Employee Retirement Income Security Act or to its, minimum vesting, anti-forfeiture and separate funding provision.

REQUEST FOR PRODUCTION NO. 6: All documents relating to any objection by Defendant to class certification of this action based on lack of numerousity, commonality of issues of fact or law, typicality or adequate representation by any Plaintiff or Plaintiffs' counsel.

Respectfully submitted,

/s/ Robert E. Goodman, Jr.
Robert E. Goodman, Jr., Lead Attorney
State Bar No. 08158100
reg@kilgorelaw.com
Theodore C. Anderson
State Bar No. 01215700
tca@kilgorelaw.com
Kilgore & Kilgore PLLC
3109 Carlisle Street
Dallas, Texas 75204
(214) 969-9099
(214) 953-0133 (telecopy)

Peter K. Stris (*pro hac vice*)
peter.stris@strismaher.com
Brendan S. Maher (*admission pending*)
State Bar No. 24053336
brendan.maher@strismaher.com
Stris & Maher LLP
19210 S. Vermont Ave., Bldg. E
Gardena, CA 90248
(424) 212-7090
(424) 212-7001 (telecopy)

Brian E. Bro
State Bar No. 03030000
brian@bebroatty.com
Law Offices of Brian E. Bro
3200 SW Freeway, Suite 2200
Houston, Texas 77027
(713) 961-3111
(281) 265-9181(telecopy)

Sam F. Baxter
State Bar No. 01938000
sbaxter@mckoolsmith.com
Theodore Stevenson, III
State Bar No. 19196650
tstevenson@mckoolsmith.com
Jennifer L. Truelove
State Bar No. 24012906
jtruelove@mckoolsmith.com
McKOOL SMITH, P.C.
104 East Houston Street, Suite 300
Marshall, Texas 75670
(903) 923-9000
(903) 923-9099 (telecopy)

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by U.S. First Class Mail and telecopy this 14th day of February, 2013 as follows:

By Telecopy (312-324-1001)

Deborah S. Davidson
Andrew Scroggins
Morgan Lewis & Bockius, LLP
77 West Wacker Drive
Chicago, Illinois 60601

By Telecopy (215-309-6001)

Ira G. Rosenstein
Samuel S. Shaulson
Morgan Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178-0060

By Telecopy (903-870-0066)

Lawrence Augustine Phillips
Siebman, Burg, Phillips & Smith, LLP
300 North Travis Street
Sherman, Texas 75090

By Telecopy (972-767-4620)

Michael C. Smith
Siebman, Burg, Phillips & Smith, LLP
113 East Austin Street
Marshall, Texas 75671

/s/ Robert E. Goodman, Jr.
Robert E. Goodman, Jr.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BILL HENDRICKS,	§	
JOHN ELLSPERMANN and	§	
FRANK ROCCISANO	§	
	§	
Plaintiffs,	§	
	§	
V.	§	CIVIL ACTION NO. 2:12-CV-00606
	§	
UBS FINANCIAL SERVICES, INC.	§	
	§	
Defendant.	§	

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT UBS FINANCIAL SERVICES, INC.

Defendant UBS Financial Services, Inc. is hereby requested to produce all documents described below in accordance with the Federal Rules of Civil Procedure.

A. DEFINITIONS

1. "Defendant" means Defendant UBS Financial Services, Inc., or any of its officers, directors, employees, agents or representatives.

2. "Person" means and includes any individual, governmental entity or agency, firm, joint venture, sole proprietorship, partnership, corporation, and all other forms of legal entity.

3. "Communication" means any written or oral communication, including but not limited to any correspondence, memorandum, report, record of a telephone call, e-mail, and record or minutes of any meeting.

4. "And" means "and/or." "Or" means "and/or." The plural of any word includes the singular and the singular includes the plural. The masculine gender of any word includes the feminine and the neuter. The past tense of a verb includes the present tense and the present tense includes the past tense.

5. "Documents" means any written or other tangible record or digital record and includes all originals and nonidentical copies of any papers, books, accounts, writings, drawings, graphs, charts, photographs, recordings, audiotape, videotape, computer record, e-mail, other

form of digital or communication media or other data compilations from which information can be obtained and translated into reasonably usable form, and tangible things.

6. "Relating to" means constituting, evidencing, based on, concerning, including or otherwise pertaining to the specified matters in question.

7. "Meeting" means any coincidence or presence of two or more persons, whether or not such coincidence or presence was by chance or prearranged, formal or informal or in connection with some activity other than the matter in question.

B. INSTRUCTIONS

1. All documents described below which are in Defendant's possession, custody, or control shall be produced. Any described document which is not in Defendant's immediate physical possession, but in regard to which the Defendant have a right to compel production from a third person or which is otherwise subject to the Defendant's control, shall be obtained and produced.

2. The production of documents from files and other separate sources shall be performed in such a manner as to insure that the file or source from which a document is obtained may be identified.

3. Documents attached to other documents or materials shall not be separated unless sufficient records are kept to permit reconstruction of the grouping.

4. If Defendant withholds any document from production on the basis of privilege or some other limitation of discovery, Defendant shall nevertheless produce each such document at the deposition and be prepared to identify such document by date, author, addressee and general subject matter and to identify all persons who received any copy thereof or otherwise obtained access thereto.

5. If any document described below was, but is no longer, in the possession of Defendant, or in existence, Defendant shall state whether it is (a) missing or lost, (b) destroyed, (c) transmitted or transferred, voluntarily or involuntarily, to others, identifying such others, or (d) otherwise disposed of, and, in each instance, explain the circumstances surrounding, and authorization for, such disposition and state the date or approximate date thereof. If any of the above information is not available, Defendant shall state any other available means of identifying such document.

C. REQUESTS

REQUEST FOR PRODUCTION NO. 1: All documents evidencing the number of financial advisors of Defendant who were separated from employment with Defendant between December 31, 2005 and December 31, 2011 and subsequently suffered a forfeiture of any firm contributions, market interest or turbo interest accrued for such individual's benefit under Defendant's PartnerPlus Plan for Branch Managers.

REQUEST FOR PRODUCTION NO. 2: All documents evidencing the amounts of any forfeitures referred to in Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 3: All documents relating to procedures used by Defendant to address the disposition of accruals for the benefit of individuals referred to in Request for Production No. 1 of firm contributions, market interest and turbo interest under its PartnerPlus Plan for Branch Managers during the period referred to in the Request for Production No. 1.

REQUEST FOR PRODUCTION NO. 4: All documents relating to procedures used by Defendant to determine whether to forfeit firm contributions, market interest and turbo interest under its PartnerPlus Plan for Branch Managers accrued for individuals referred to in Request for Production No.1 under its PartnerPlus Plan for Branch Managers during the period referred to in Request for Production No.1.

REQUEST FOR PRODUCTION NO. 5: All documents relating to any contention by Defendant that the PartnerPlus Plan for Branch Managers is not subject to the Employee Retirement Income Security Act or to its, minimum vesting, anti-forfeiture and separate funding provision.

REQUEST FOR PRODUCTION NO. 6: All documents relating to any objection by Defendant to class certification of this action based on lack of numerousity, commonality of issues of fact or law, typicality or adequate representation by any Plaintiff or Plaintiffs' counsel.

Respectfully submitted,

/s/ Robert E. Goodman, Jr.

Robert E. Goodman, Jr., Lead Attorney
State Bar No. 08158100
reg@kilgorelaw.com
Theodore C. Anderson
State Bar No. 01215700
tca@kilgorelaw.com
Kilgore & Kilgore PLLC
3109 Carlisle Street
Dallas, Texas 75204
(214) 969-9099
(214) 953-0133 (telecopy)

Peter K. Stris (*pro hac vice*)
peter.stris@strismaher.com
Brendan S. Maher (*admission pending*)
State Bar No. 24053336
brendan.maher@strismaher.com
Stris & Maher LLP
19210 S. Vermont Ave., Bldg. E
Gardena, CA 90248
(424) 212-7090
(424) 212-7001 (telecopy)

Brian E. Bro
State Bar No. 03030000
brian@bebroatty.com
Law Offices of Brian E. Bro
3200 SW Freeway, Suite 2200
Houston, Texas 77027
(713) 961-3111
(281) 265-9181(telecopy)

Sam F. Baxter
State Bar No. 01938000
sbaxter@mckoolsmith.com
Theodore Stevenson, III
State Bar No. 19196650
tstevenson@mckoolsmith.com
Jennifer L. Truelove
State Bar No. 24012906
jtruelove@mckoolsmith.com
McKOOL SMITH, P.C.
104 East Houston Street, Suite 300
Marshall, Texas 75670
(903) 923-9000
(903) 923-9099 (telecopy)

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served upon Defendant's counsel of record by U.S. First Class Mail and telecopy this 14th day of February, 2013 as follows:

By Telecopy (312-324-1001)

Deborah S. Davidson
Andrew Scroggins
Morgan Lewis & Bockius, LLP
77 West Wacker Drive
Chicago, Illinois 60601

By Telecopy (215-309-6001)

Ira G. Rosenstein
Samuel S. Shaulson
Morgan Lewis & Bockius, LLP
101 Park Avenue
New York, New York 10178-0060

By Telecopy (903-870-0066)

Lawrence Augustine Phillips
Siebman, Burg, Phillips & Smith, LLP
300 North Travis Street
Sherman, Texas 75090

By Telecopy (972-767-4620)

Michael C. Smith
Siebman, Burg, Phillips & Smith, LLP
113 East Austin Street
Marshall, Texas 75671

/s/ Robert E. Goodman, Jr.
Robert E. Goodman, Jr.